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June 14, 1993

Ms. Donna Searcy
Secretary
Federal Communications Commission
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serious concerns raised in our earlier comments. Alcatel apparently believes that because it has dropped its proposal of disrupting the carefully crafted 10 MHz "off-set" which exists between Fixed Service and Fixed Satellite Service (FSS) operations in the 4 GHz band, the problem of satellite interference is solved. Nothing could be further from the truth. The new plan opens the 4 GHz band to a flood of displaced FS operations, and then assigns them 10 and 20 MHz wide FS channels -- a recipe for disaster. For example, Alcatel could place a 20 MHz digital carrier at 3710 MHz. The spectral mask of this carrier would cover 3700 - 3720 MHz. The next carrier will be centered at 3730 MHz, and its spectral mask would range from 3720 - 3740 MHz. Under the Alcatel proposal, thousands of new digital FS transmitters could literally fill the entire 500 MHz of spectrum between 3.7 - 4.2 GHz. This digital "microwave wall" would render C-Band HSD's (both analog and digital) useless if they were located anywhere near the microwave transmission path.

As discussed in detail in our earlier filings and those of other satellite interests, the growth of the HSD industry has been seriously hampered by existing Fixed Service operations, and the added costs borne by an HSD owner to add terrestrial interference (T.I.) filters to an analog satellite system is in the range of \$700 - \$1,000. The number of HSD installations subjected to T.I. will skyrocket under the Alcatel proposal as the door is opened for up to 23,000 new microwave links to enter the band.

Furthermore, digital transmissions are rapidly expanding in the satellite industry, and unlike existing analog equipment, digital satellite receivers simply cannot employ T.I. filters due to the fact that the satellite signal can be spread across the entire 36 MHz of the transponder -- any use of a "notch filter" would destroy essential parts of the satellite signal. SBCA is unaware of any technological solution which will allow for the reception of a digital satellite signal on transponder 1 for example (3702 - 3738 MHz) in the face of digital microwave transmissions covering that entire transponder bandwidth.

Frankly, despite the rhetoric Alcatel has submitted to the FCC about its concerns for the HSD industry, its comments demonstrate otherwise. In its Reply Comments of January 26, 1993, Alcatel charged that "...satellite users 'invaded' the 4 GHz band" (p.28) and, in replying to SBCA's concern over the impact of reaccommodation on HSD's, said, "This is an acknowledged problem. It is truly unfortunate that home satellite dishes, although legally accorded only secondary status, can seriously limit the use of the 4 GHz band by terrestrial microwave users accorded primary status." (p.40) SBCA rejects Alcatel's proposition that HSD's "invaded" the 4 GHz band, and would point out that the Commission itself has a long history of encouraging the growth of HSD's as a viable multichannel video provider.

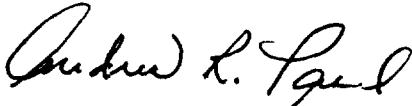
SBCA has attempted to put forth positive solutions to the serious issue of finding a new home for the displaced 2 GHz operators. We have urged the Commission to explore a

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variety of other candidate bands, and we even joined with Alcatel in calling upon the Commission to examine the 3.6 - 3.7 GHz band. Further, while SBCA has indicated that reaccommodation of displaced operators into the 5.945 - 6.425 C-Band "Feederlink" allocation could pose problems for uplink operators, we have not actively opposed consideration of the band.

SBCA urges the rejection of this "11th hour" proposal from Alcatel which was filed months after the window for comments on 92-9 closed. Further, if the Commission is truly committed to its policy of promoting the growth of a competitive multichannel video market place, it must remove the 3.7 - 4.2 GHz allocation from consideration as a reaccommodation band in this proceeding. Any plan which either rechannelizes the band and/or opens it to reaccommodation will result in serious and irreparable damage to the millions of existing HSD owners and will close the door on the future of the C-Band HSD industry. Such action would be in direct conflict not only with the Commission's competition policy but would also undermine the recent Congressional actions designed in no small part to bolster the home satellite industry.

Sincerely,



Andrew R. Paul
Senior Vice President



Harry W. Thibedeau
Manager of Industry and Technical Affairs